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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AT&T Petition for Waiver of Section 64.1701 of the Commission's Rules	)))

To: Common Carrier Bureau

AT&T CORP.'S PETITION FOR WAIVER AND REQUEST FOR EXPEDITED CONSIDERATION

Pursuant to the Section 1.3 of the Commission's Rules, 47 C.F.R. § 1.3, AT&T Corp. ("AT&T") seeks a waiver of the Commission's rate averaging rules (47 C.F.R. § 64.1701) authorizing it to offer promotions of more than 90 days' duration to New Jersey customers in the interstate "corridors" served by Bell Atlantic. In view of the competition AT&T currently faces from Bell Atlantic in these corridors, AT&T further requests that consideration of this petition be expedited.

In an Order issued August 7, 1996 in CC Docket No. 96-61,[1] the Commission adopted rules, pursuant to Section 254(g) of the Communications Act ("Act"), that require interexchange carriers ("IXCs") to offer nationwide averaged rates. However, applying the criteria of Section 10 of the Act, the Order also forbears from enforcing the

[1] Policy and Rules Concerning the Interstate, Interexchange Marketplace, FCC 96-331 ("Order").

Since 1984, Bell Atlantic has been permitted to provide interstate interLATA services in two "corridors." The first such corridor includes calls from five counties in northeastern New Jersey to the New York City metropolitan area. The second includes calls between the Camden, New Jersey area and Philadelphia, Pennsylvania. The customers in these two areas together comprise half of AT&T's customers in New Jersey, and about 25% of the interstate calling from these areas is corridor traffic. Bell Atlantic actively promotes its corridor service, especially the New Jersey-New York corridor service, using both radio and direct mail advertising to urge customers to "dial 10-N-J-B" and save over AT&T's basic rates.[3] The direct mail advertising includes bill inserts and special mailings to targeted customers, urging them to avoid "paying high long distance rates" for calls in the corridor. According to Bell Atlantic's public statements, its marketing has been successful in attaining a 20% market share of the interstate calling in these areas. By AT&T's estimates, Bell Atlantic is the second largest provider of interstate calling in the New Jersey portion of the corridors.

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[3] Attachment A shows a comparison between Bell Atlantic's corridor rates and AT&T's basic interstate rates for the mileage bands applicable to the corridors. Attachment B appends copies of Bell Atlantic marketing and advertising materials relating to corridor calling.

As shown in Attachment A, Bell Atlantic has established special postalized rates for calling in the corridors which are lower than AT&T's nationwide averaged rates for calls of similar distances. Bell Atlantic's lower corridor rates may reflect its lower cost of access it procures from its own monopoly exchange operation. Unlike Bell Atlantic, AT&T is required by the Commission's rate averaging rules to reflect both the higher access charges AT&T must pay Bell Atlantic to originate and/or terminate corridor traffic, and the higher unit costs of access it purchases from other LECs across the country for non-corridor interLATA services that Bell Atlantic has, until recently, been forbidden to provide under the MFJ.

In addition, Bell Atlantic has recently begun offering out-of-region interLATA services at basic rates that are comparable to AT&T's basic interstate rates[4] -- and rates that are higher than Bell Atlantic's corridor rates -- in apparent violation of the rate averaging rules. AT&T seeks this waiver to enhance its ability to compete in the corridor, but if the waiver is denied, the Commission must

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[4] See Attachment A. Bell Atlantic is currently marketing out-of-region long distance services in North Carolina, Texas and Michigan, and it has received authorization to provide such services in several other states. Bell Atlantic also offers out-of-region customers at least two optional calling plans, both of which also have rates that are different from its corridor rates.

at a minimum, act to enforce its rate averaging rules as to Bell Atlantic.

Allowing carriers the additional flexibility to offer lower prices in the corridor areas clearly serves the public interest in increasing competition,[5] and it also fulfills the "good cause" requirement of Section 1.3 of the Commission's rules,[6] because it meets the three-prong test of Section 10. Competition in the corridors is unlike competition in most other areas of the country, because all carriers are permitted to offer interstate interLATA services, including the dominant incumbent LEC. Thus, enforcement of the rate averaging rules in the corridors is not necessary to protect the consumers there, who already benefit from the highest degree of competition possible.[7] Moreover, the requested waiver would only give carriers the option of offering extended promotions in the corridors at prices lower than their nationwide average rates. Thus, enforcement of the rate averaging rules is not needed to

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[5] See Section 10(a)(3).

[6] See WAIT Radio v. FCC, 418 F.2d 1153, 1159 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972); Northeast Cellular Tel. Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990), citing Industrial Broadcasting Co. v. FCC, 437 F.2d 680 (D.C. Cir. 1970).

[7] See Section 10(a)(2).

Attachment A

AT&T Interstate Rates/ Bell Atlantic Out-of-Region Rates (Basic Schedule)

	Day	Eve	N/W
1- 10 miles	$0.25	$0.14	$0.12
11- 22 miles	$0.26	$0.15	$0.13
22- 55 miles	$0.27	$0.16	$0.13
56-124 miles	$0.27	$0.16	$0.14

Bell Atlantic Corridor Rates

Day	Eve	N/W
$0.18	$0.11	$0.10

* Bell Atlantic's basic schedule also provides volume discounts.

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Washington, D.C. 20554

AT&T Petition for Waiver of Section 64.1701 of the Commission's Rules	)))	CCB/CPD 96-26

To: Common Carrier Bureau

COMMENTS

MCI Telecommunications Corporation (MCI), pursuant to the Commission's Public Notice (DA 96-1779), dated October 28, 1996, hereby comments in support of "AT&T Corp.'s Petition For Waiver And Request For Expedited Consideration," filed on October 23, 1996. Therein, AT&T seeks a waiver of the Commission's rate averaging rules, 47 C.F.R. § 64.1701, in order to offer promotions exceeding 90 days in duration to customers in New Jersey who reside in two interstate "corridors" served by Bell Atlantic.[1]

MCI fully supports AT&T in its waiver request and asks that the Bureau similarly grant such waiver to MCI so that it likewise will be in a position to benefit consumers by being able to compete effectively against Bell Atlantic and AT&T, assuming the latter's request herein is granted. Otherwise, telecommunications consumers along these corridors will suffer as

[1] These "corridors" involve calls from five counties in northeastern New Jersey to the New York City metropolitan area and calls between the Camden, New Jersey, area and Philadelphia, Pennsylvania. Bell Atlantic's right to carry these interstate calls arose from the Modified Final Judgment, which essentially was superseded by the Telecommunications Act of 1996.

Atlantic is violating the Commission's rate-averaging rule.[5]

AT&T offers compelling arguments to support its position that a waiver would serve the public interest.[6] MCI will not repeat those arguments here but wishes to note that it fully supports them. Most importantly, a grant of the requested waiver would benefit affected consumers rather than harm them. Indeed, consumer harm would result from a denial of the waiver because such an outcome would impede competition and the lower pricing that follows from it.

In other filings relating to the geographic rate averaging requirement, MCI has pointed out, correctly, that, although social policy is advanced by the concept, competitive policies are not. Simply put, geographic rate averaging requires that pricing be based not on cost but, rather, on the need to average differing costs -- and thus rates -- in a fashion that unfairly allows regional or, in this case, local carriers to price in a manner that may advantage them. If nationwide carriers with differing cost structures are not permitted to meet competition in markets in which they have a right to compete, they effectively will be denied the ability to compete. In that instance, consumers lose.

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[5] The Regional Bell Operating Companies apparently believe that the requirement is inapplicable to them. In this regard, NYNEX is offering a postalized rate out of Florida that is different if calls are made to New York versus calls traversing the same geographic distance that are made to other locations in the United States.

[6] AT&T Petition at 5-7.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Policy and Rules Concerning the Interstate, Interexchange Marketplace Implementation of § 254(g) of the Communications Act of 1934, as amended	)	CC Docket No. 96-61 DOCKET FILE COPY ORIGINAL

AT&T COMMENTS

Market Definition, Separations, Rate Averaging and Rate Integration

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April 19, 1996

on the entire national market.[53] This has allowed such carriers to develop and maintain nationwide averaged rate structures. Entry of large regional carriers such as GTE and SNET, however, alters the competitive considerations.[54] In this environment, rigid rate averaging and rate integration requirements, which necessarily limit carriers' ability to establish prices that reflect underlying costs, would inhibit national carriers' ability to compete with regionally-based competitors in low-cost areas, thereby discouraging carriers from offering service to customers in rural and high-cost areas -- as the Commission has recognized. See NPRM, ¶ 69 n.154 ("if new entry substantially increases competition in areas with high volumes and low costs, nationwide interexchange carriers may be placed at a competitive disadvantage if they are not permitted to offer regional discounts in such areas"). It is absolutely critical that the Commission's rate averaging and rate integration rules recognize and take account of this reality.

Specifically, because nationwide carriers will, by definition, have higher average costs than regional carriers who serve only low cost areas, rigid rate averaging and rate

[53] See Further Notice of Proposed Rulemaking, Policy and Rules Concerning Rates for Dominant Carriers, 3 FCC Rcd. 3195, 3452 (1988) (noting that AT&T and other IXCs historically engaged in rate averaging "primarily because they have strong economic incentives to average their rates"); Notice of Proposed Rulemaking, Competition in the Interstate Interexchange Marketplace, 5 FCC Rcd. 2627, 2649 (1990).

[54] The NPRM (¶ 53) correctly assumes that LECs generally will be regionally-focused competitors and provide interexchange services predominantly to customers in their own local service territories -- as has historically been the case for the interexchange affiliates of LECs such as SNET and Rochester Telephone.

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SEP 16 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Policy and Rules Concerning the Interstate, Interexchange Marketplace	)))	
	)	CC Docket No. 96-61
Implementation of Section 254(g) of the Communications Act of 1934, as amended	)))	

AT&T CORP.'S PETITION FOR RECONSIDERATION

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September 16, 1996

I. The Commission Should Adopt a Forbearance Rule that Provides Adequate Flexibility for Nationwide Carriers to Compete with Regional Carriers.

In the Order (¶ 38), the Commission declined to adopt an exception to its general rate averaging rule that would permit national carriers to offer geographically specific rates to compete with the offers of large regional carriers. The Commission (¶ 39) found that the national carriers proposing such an exception based their claims "entirely on generalized assertions of the alleged need" for such relief. AT&T submits that the need for the exception -- and the indisputable consumer benefits it would yield -- are so obvious that even "generalized assertions" more than justify relief on reconsideration. Moreover, recently-available facts concerning the activities of the interexchange affiliates of incumbent local exchange carriers now confirm that national carriers need greater flexibility to file geographically specific rates and optional calling plans, and that consumers will reap immediate benefits if the Commission grants the relief AT&T requests here.

The clearest example of the need for geographically-specific rates is the rapidly emerging competition from SNET in Connecticut. Since comments were filed in this proceeding, SNET has continued its massive -- and extremely successful -- marketing campaign to customers in its home state. A recently published report states that SNET has now captured 25% of the customers for long distance in its operating area, which market analysts describe as "the ultimate high margin, low capital intensity vertical service" for local exchange carriers.[1]

SNET's in-region marketing focuses on several key attributes which cannot be duplicated by its national competitors, including the fact that SNET is the only entity which can practicably offer a complete package of local, intraLATA toll, interLATA and cellular services, all of which can be provided on a single bill.[2] SNET also seeks in its advertising to position itself as the "home town" local carrier with the closest ties to customers in its area. This campaign has been so successful that over 260,000 residential customers "outPIC'd" from AT&T to SNET in Connecticut between March and July of this year.

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[1] Merrill Lynch, "Telecom Services -- RBOCs & GTE," August 9, 1996, p. 1. See also id. ("In our view, LD enables the RBOCs/GTE to gain enough to offset the inevitable pain of losing local market share").

[2] Although AT&T is now certified to be a local service provider in Connecticut, it cannot reasonably offer local services. AT&T has not yet been able successfully to negotiate an interconnection agreement with SNET, and SNET's "wholesale" residential rates are more than 50% higher than the rates it charges for those same services when they are sold directly to retail customers.

Notwithstanding these handicaps and SNET's success, AT&T has attempted to compete with SNET by launching its own marketing campaign to win back customers who had changed to SNET and to retain existing customers. Because it could not match the breadth of SNET's "all distance" offers, which include both local and intraLATA toll services, AT&T offered several different promotional discounts to customers in the SNET area. Because AT&T was generally competing with permanent SNET rates and rate structures, however, it was not sufficient to offer these customers short-term promotions. Accordingly, AT&T filed and offered promotional discounts on interstate calls that ran for periods of six to twelve months. At the time AT&T filed these promotions, they were fully consistent with existing Commission policies and IXC industry practices. Nevertheless, SNET responded to AT&T's efforts by filing a complaint with the Commission alleging that AT&T's promotions violated the rate averaging requirements.[3] Thus,

[3] SNET America, Inc. v. American Telephone and Telegraph Company, E-96-34, filed July, 8, 1996 ("Complaint"). AT&T's Answer (filed September 4, 1996) demonstrates that the Complaint is meritless because the subject promotions are consistent with long-standing, articulated Commission policies and rulings that permit similar promotions to take effect and that acknowledge the public benefits of such offerings. In addition, even though SNET had previously sought an exemption from the requirements of Section 251 of the Telecommunications Act of 1996 on the ground that it is a "rural" carrier, SNET argued in its

(footnote continued on following page)

SNET has attempted to use the rate averaging rules as a shield against more effective competition in its service area. This is directly inconsistent with the intent of the 1996 Act to foster competition in all telecommunications markets.[4]

Alltel's activities in Georgia provide another example of the ability of incumbent LEC IXC affiliates to provide unique competitive challenges for national carriers.[5] Between March and July of this year, AT&T customers who "outPIC'd" to Alltel totaled over 25% of the residential customers Alltel serves in that state. Similar to SNET, Alltel's success is focused on the fact that only it can practicably provide a full range of local, intraLATA toll and interLATA services to its "home town" customers.

From a rate averaging perspective, national and regional carriers are in substantially different positions. Rate averaging requires national carriers to view all of

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(footnote continued from previous page)

Complaint (¶ 7) that nearly 96% of the areas in Connecticut are urban.

4 See Implementation of Local Competition Provisions in the Telecommunications Act of 1996, FCC 96-325, released August 8, 1996, ¶ 3.

5 Although Alltel operates in many states, it has not yet launched substantial IXC services elsewhere. Georgia, however, represents about one-third of Alltel's total customers.

THE HARTFORD COURANT

May 17, 1996 Friday, STATEWIDE

SECTION: BUSINESS; Pg. F1

LENGTH: 524 words

HEADLINE: AT&T MAKING NEW RATE OFFER IN CONNECTICUT

BYLINE: WILLIAM HATHAWAY; Courant Staff Writer

BODY:

AT&T thinks a nickel might be enough to disconnect Southern New England Telephone from its Connecticut customers.

In the state's escalating telecommunications war, AT&T Thursday fired the latest salvo by promising to charge its out-of-statelong-distance customers just 5 cents a minute for long-distance calls made within the state.

SNET's per-minute rates range from 4.3 cents to 23 cents, depending on the time and day of the call and which of a variety of service plans the customer has, the company said.

AT&T's offer becomes effective May 21 and would be good for a year.

AT&T says Connecticut is the only state where it is offering the plan, which it claims can save customers up to 69 percent over SNET's in-state long-distance rates.

"It's an aggressive marketing campaign and it's a campaign geared specifically to Connecticut, " said AT&T spokeswoman Susan Ramsey.

SNET responded immediately to the afternoon announcement, claiming that AT&T's higher charges on out-of-state calls would eat away the savings, if any, of AT&T's in-state calling plan.

"It's like the tire store giving you a free set of front tires,while jacking up the price for the rear tires," said Nancy Pitz, president of SNET's consumer service subsidiary.

SNET officials said that not all customers would realize the 53 percent to 69 percent savings that AT&T is promoting on in-state long distance calls. Some of SNET's off- peak rates actually are cheaper than 5 cents a minute, they said.

"Five cents a minute sounds like a good deal at first glance, but it's another attempt by AT&T to confuse customers," Pitz said.

AT&T said Connecticut was targeted because of competition from scores of companies interested in providing telephone services within the state.

AT&T's nickel rate would apply every day at all times, on up to 1,500 minutes of calls a month. The price is guaranteed if consumers sign up by July 31.

About 70 percent of state consumers are now able to use AT&T for in-state calls without dialing a cumbersome access code. Until last November, all state residents had to dial an access code to make in-state long-distance calls with AT&T.

The new marketing campaign, spearheaded by newspaper and television advertising that begins today, itself is a prelude to another planned marketing blitz later this summer.

AT&T's ultimate aim is to break SNET's stranglehold on the state's local service business. The company plans to offer local telephone service by late summer or early fall. The telecommunications giant hopes that customers attracted to the in-state long-distance plan will stay with AT&T for local service.

However, whether AT&T ever offers local service might depend on state regulators.

SNET has asked the Department of Utility Control to grant it an exemption as a "rural" carrier under provisions of the 1996 telecommunications act. Such an exemption would allow SNET to charge higher rates to carriers such as AT&T to use SNET's network.

A ruling in favor of SNET would make it too costly for AT&T to offer local service, Ramsey said.

State regulators said a ruling could come as early as today..

Business Week

October 28, 1996

SECTION: INFORMATION PROCESSING; TELECOMMUNICATIONS; Number 3499; Pg. 167

LENGTH: 1333 words

HEADLINE: A TELECOM YANKEE DEFENDS ITS TURF

BYLINE: By Susan Jackson in New Haven

HIGHLIGHT:
Can Connecticut's SNET keep AT&T and other titans at bay?

BODY:

David E. Joslin of Lebanon, Conn., may be a harbinger of the telecom future. Sick of telemarketing calls from big-name long-distance companies, Joslin, a 30-year-old computer graphics designer, chose the only carrier in his state that offers local and long-distance calling on one bill: Southern New England Telecommunications Corp. (SNET), a $ 1.84 billion, 118-year-old independent phone company that serves only Connecticut. A few months later, he heard that SNET offered Internet access. Since SNET already had his billing information, he signed up with a few mouse clicks and a phone call. "Time is money," he says.

Connecticut's phone customers are providing important clues as to how the telecom battle will shape up now that federal regulations barring competition have been quashed. Even before Congress passed a sweeping deregulation bill last February, the Nutmeg State was loosening restrictions on local and in-state toll calls, allowing new entrants as large as AT&T and as small as cellular operator Connecticut Telephone to storm the market. So far, 14 companies have been authorized to offer local service in the state, and 130 can carry in-state toll calls. And all of them are after New Haven-based SNET.

The stakes for the defender are brutally high: win or be swallowed. Bell Atlantic and Nynex, which cover all of the Northeast coast except Connecticut, have announced plans to merge. If the merger goes through on schedule by early next year, SNET, the hole in the middle of this telecom-rich doughnut, could be a prime takeover target. The two companies deny any interest in SNET, but they also question its ability to stay single. "We certainly thought we needed to be bigger to survive," says Nynex Chairman Ivan Seidenberg. "I don't know what they're thinking."

SNET's strategy: come up with the services, prices, and marketing that will keep customers from switching. It has no time to dither. Tele-Communications Inc. (TCI) and a handful of other competitors are already offering limited local service. Once the state sets local resale rates early next year, other rivals will start grabbing local-calling business. The incumbent's ability to handle the challenge will resonate far beyond its region -- its fate could be an omen for the 900 or so non-Bell local companies.

Despite its small size, SNET has some important advantages. Because it wasn't part of the Bell System at the time of the 1984 divestiture, SNET was never subject to the same federal restrictions as the Baby Bells. It got the go-ahead from regulators to offer long distance in 1994; the Bells are a year or more away from chasing the same prize. Connecticut regulators also granted SNET the nation's first statewide cable-TV franchise on Sept. 25. The company expects to roll out service early next year, using a $ 4.5 billion fiber-optic and coaxial cable network able to carry voice, video, and data simultaneously.

SNET has wasted no time going after new markets. It began reselling Sprint Corp. out-of-state long-distance service in April, 1994. To date, SNET has signed up about 30% of its customers for the service and has 20% of the $ 550 million market for Connecticut's interstate calls, estimates Merrill Lynch & Co. analyst Richard C. Toole. He figures that in Connecticut, AT&T's market share has dropped from 60% to less than 50%, thanks to SNET. "The voracity with which AT&T is competing in Connecticut indicates they're not pleased with their market share," says Yankee Group Inc. consultant Boyd C. Peterson.

Indeed, based on what's happening in Connecticut, it looks like the local phone monopolies may be better competitors than many analysts expected. Not that SNET is the model of a modern phone company. Despite cost-cutting moves, at the end of the first half, it had 41.5 employees for every 10,000 access lines, compared with an average of 30.8 for the Baby Bells. Only 56% of its network has been converted to digital lines, which are critical for carrying new high-speed services such as fast Internet access. Neighboring Nynex has upgraded 81% of its lines with digital technology. NICKEL RIDE. SNET is proving its marketing savvy, however. In May, when AT&T offered Connecticut residents a rate for in-state calls of 5 cents a minute, it took SNET just a day to come back with its own savings plan: billing all in-state toll calls in one-second increments rather than rounding up to the next minute, as AT&T does. In July, SNET offered $ 75 in free out-of-state calls for three months.

But SNET can't succeed on marketing alone. Ultimately, it wants to be able to offer local, long-distance, cable, wireless, and Internet services, all on one bill, with one service rep. It's gambling on the $ 4.5 billion network upgrade -- due to be completed by 2007 -- to keep customers in its court with all sorts of interactive services, such as video calling and home shopping.

In the meantime, SNET is moving on the regulatory front to delay competition. In May, it tried to get itself classified as a rural phone company so that it could continue as a monopoly under a waiver set up by federal laws. Competitors were incredulous -- Connecticut is one of the most densely populated states -- and state regulators said no. In August, SNET tried again, filing court challenges to a federal ruling on the wholesale rates it must offer competitors that want to resell its service. Those challenges are still pending.

SNET knows that, at most, it can delay competition, not prevent it. "We recognize that all our markets will be open, and that's not a bad thing," says SNET general counsel Madelyn M. DeMatteo. AT&T, which aims to start testing local service in Connecticut by yearend, brings a lot of firepower to the contest, especially in terms of brand image. In consumer surveys, 70% of Connecticut residents said they would choose AT&T for all calling needs. "I don't get up every morning and climb in the bunker and worry about what SNET has done the day before," says David Bogue, AT&T's Connecticut vice-president.

SNET, though, has reason to worry. Competitors are likely to grab 15% of its $ 650 million a year in local revenues, says Lehman Brothers Inc. analyst Blake Bath. "We have nowhere to go but down in local," admits Ronald M. Serrano, head of corporate development for SNET. And companies from all over are eager to try their hands at local calling in Connecticut. "It's quite a fishbowl for testing in the telecommunications arena," says Terri Bryan, marketing director of TCI's Telephony Services Div.

To ready the company, CEO Daniel J. Miglio wants to diversify through strategic partnerships. SNET just joined Americast, a programming joint venture of BellSouth, GTE, SBC Communications, and Walt Disney. Miglio has also slashed costs 17% over the past four years and cut the workforce by 13%, to 9,000.

But all the partnerships and cost-cutting will not give SNET the marketing clout, economies of scale, or financial muscle of the telecom titans it is about to face. That may not matter, however, if one of these rivals decides it would rather buy than fight.

Connecticut: A Laboratory For Competition

LOCAL PHONE SERVICE SNET is still the only provider in the $ 640 million market, but full competition should begin early next year. Among 14 companies already authorized to provide service: AT&T, MCI, Sprint, and Tele-Communications.

LONG DISTANCE SNET has grabbed an estimated 20% of the state's $ 500-$ 550 million toll-call market since it started offering service in 1994. More than 130 companies have been authorized to provide service, but the market is dominated by AT&T, SNET, and MCI.

CABLE TELEVISION At 84% of households, Connecticut has the second-highest cable penetration in the U.S. TCI and Cablevision dominate the $ 375 million market. SNET won a state-wide franchise in September. It will start service in 1997.

DATA: SNET, MERRILL LYNCH, BUSINESS WEEK

GRAPHIC: ILLUSTRATION: BRUTAL STAKESSNET'S ABILITY TO HANDLE LOCAL-CALLING COMPETITION COULD BE A HARBINGER FOR THE 900 OR SO NON-BELL LOCAL COMPANIES
CLEMENTE BOTELHO